

UNITED STATES DISTRICT COURT

NIKKI BOLLINGER GRAE, Individually and) Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)
)
Plaintiff,)
)
vs.)
)
CORRECTIONS CORPORATION OF)
AMERICA, et al.,)
)
Defendants.)
)

**CORECIVIC’S MOTION TO DETERMINE SUFFICIENCY OF RESPONSES TO
CORECIVIC’S FIRST SET OF REQUESTS FOR ADMISSION AND COMPEL
FURTHER RESPONSES TO CORECIVIC’S FIRST SET OF REQUESTS FOR
ADMISSION AND SECOND SET OF INTERROGATORIES**

Pursuant to the Court’s July 16 Order, ECF No. 244, Defendant CoreCivic, Inc. (“CoreCivic”) respectfully moves the Court to determine the sufficiency of Plaintiff’s responses to CoreCivic’s First Set of Requests for Admission (“RFAs”) and compel further responses to (or, where appropriate, deem admitted) CoreCivic’s First Set of Requests for Admission and Second Set of Interrogatories (“Interrogatories”). Specifically, CoreCivic asks that the Court determine the sufficiency of and compel further answers to RFA Nos. 3, 4, 5, 6, 8, 11, 14–18, 20, 22–24, 28, 33, 34, 39, 40, and 45–54, and that the Court compel further answers to Interrogatory Nos. 17–21 and 27–40. CoreCivic is filing contemporaneously herewith a memorandum of law

citing relevant authorities in support of this Motion, and two Declarations setting forth facts and exhibits relied on in the Motion.

DATED: July 27, 2020

Respectfully submitted:

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CERTIFICATE OF SERVICE

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this 27th day of July, 2020.

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